

REMARKS

INTRODUCTION

Prior to this response, Claims 1-17 were pending in the application. No claims are added or canceled by this response. Therefore, Claims 1-17 are presently pending in the application.

REJECTIONS BASED ON PRIOR ART

Rejections under 35 U.S.C. §102(b)

The Office Action rejected Claims 1, 2, 4-10 and 12-14 under 35 U.S.C. §102(b) as allegedly being anticipated by Lowry et al. ("*Lowry*"; U.S. Pat. No. 4,864,497). This rejection is traversed.

DISCUSSION OF CLAIM 1

A thorough explanation of why Claim 1 is allowable over *Lowry* was provided in the previous response. That explanation went so far as to provide example scenarios that clearly illustrate differences between Claim 1 and the teachings of *Lowry*. Nevertheless, some of the rejections were maintained based on a misunderstanding of one of the scenarios. This response is intended to clear up that misunderstanding.

Specifically, the Office Action contends that Applicants' remarks regarding the first scenario (a) of a previously-presented hypothetical are based on an assumption that "the lock on the field in the target object is released before the source application modifies that object." As is explained hereafter, the first scenario makes no such assumption.

The Office Action goes on to say that releasing the lock removes the overwrite protection and that "[i]f the target lock is not released, then the source application is not able to overwrite the changes made by the target application" and, therefore, a scenario in which the

lock is maintained satisfies the claimed limitations. As is also explained hereafter, whether or not the lock is released or maintained, the limitations of Claim 1 would not be satisfied.

Specifically, regardless of whether the lock of *Lowry*, as applied by the Office Action to Claim 1, is released or not, Lowry does not anticipate Claim 1. Claim 1 recites, among other things:

(1) revising said target object in said target application (2) to reflect said second modification to said source object (3) without removing said first modification to said target object.

If the lock were not released, then limitation (2) is not satisfied. In other words, if a locking mechanism is used in an attempt to replicate Claim 1, with a lock being held on the target object by the target application against the source application, then the **second modification to the source object** would not be completed, as explicitly recited in Claim 1.

On the other hand, if the lock is released, then limitation (3) is not satisfied. That is to say, the **first modification to the target object would be removed**. The Office Action is correct in recognizing that release of the lock would allow the source application to **overwrite** the object. However, as anyone who uses a word processor has painfully discovered, when something is overwritten, previous changes to the file are lost. This is in direct conflict with an explicit limitation of Claim 1.

If the source application modifies a field of the original source record and converts and saves it back to the *Lowry* database, (a) the modification made by the target application will be overwritten, or (b) a new record, or snapshot, will be created with the modification made by the source application, separate from the record or snapshot containing the field with the modification made by the target application. Thus, this scenario could not possibly satisfy the limitations recited in Claim 1. In fact, the analyses presented in the Office Actions, when

refuted, further exemplify some of the advantages and value of the invention recited in Claim 1, for they show that a simple locking structure cannot be used to accomplish what is accomplished by the invention recited in Claim 1.

Based on the foregoing, Claim 1 is not anticipated by, and is therefore patentable over, the *Lowry* reference. Withdrawal of the rejection of Claim 1 is requested.

Claims 2-8 depend directly or indirectly from Claim 1. Therefore, Claims 2-8 are patentable over the references of record for at least the same reasons as Claim 1. Withdrawal of the rejection of Claims 2-8 is requested.

Independent Claim 9 recites limitations similar to Claim 1, whereby, generally, a sequence of modifications are made to respective corresponding objects in different applications that support different formats and both the modifications are reflected in a single object (the "second object"). Therefore, reasons for patentability based on distinguishing over *Lowry* as discussed above in reference to Claim 1 are also reasons for the patentability of Claim 9, to the extent applicable. Withdrawal of the rejection of Claim 9 is requested.

Claims 10 and 11 depend from Claim 9. Therefore, Claims 10 and 11 are patentable over the references of record for at least the same reasons as Claim 9. Withdrawal of the rejection of Claims 10 and 11 is requested.

Claims 12 and 13 are computer-readable medium and system claims that correspond to the method of Claim 1. Hence, Claims 12 and 13 are patentable over the cited references of record for at least the same reasons as Claim 1. Withdrawal of the rejection of Claims 12 and 13 is requested.

The citations to *Lowry* that are relied on for the rejection of Claim 14 are the same citations relied on for the rejection of Claim 1. *Lowry* describes a common database structure, converters, snapshot files, a database controller and locks, none of which are applicable to the

invention recited in Claim 14. For example, Claim 14 recites the following limitation, among others:

generating a hierarchical structure for organizing one or more properties of a source object being translated to a target object, **wherein each level of the hierarchical structure is associated with a property of an object** and wherein the source object is associated with a source application and the target object is associated with a target application;

Lowry does not disclose or suggest this limitation. The hierarchy of Lowry is based on a “being-held” relationship between two attribute data objects. Therefore, “sibling” objects at the same level of the *Lowry* hierarchy would have nothing in common except for being-held by a common parent. In contrast, the **hierarchical structure recited in Claim 14 is such that each level is associated with an object property**. Thus, “sibling” objects at the same level of the Claim 14 hierarchy are associated with the same object property. Page 17 of the present application, under the heading “Hierarchy Structure”, provides non-limiting examples of properties. For example, properties of objects in the context of a CAD application may be thickness, color, layer and ID. *Lowry* does not anticipate Claim 14 because *Lowry* does not teach a hierarchy of objects in which each level of the hierarchy is associated with a different object property. Therefore, Claim 14 is patentable over the references of record and withdrawal of the rejection is requested.

Rejections under 35 U.S.C. §103(a)

The Office Action rejected Claims 3 and 11 as allegedly unpatentable under 35 U.S.C. §103(a) over *Lowry* in view of Baraquet et al. (“*Baraquet*”; “A Data Front-End for Layered Manufacturing”). This rejection is traversed.

Claim 3 depends from Claim 1 and Claim 11 depends from Claim 9. *Lowry* is relied on in the rejection for the limitations of the independent Claims 1 and 9, however, it is shown above that *Lowry* does not disclose or suggest several limitations of these claims. Therefore, *Lowry* does not support a prima facie case of obviousness with respect to Claims 3 and 11. In addition, *Baraquet* does not cure the deficiencies of *Lowry*. Since both of Claims 1 and 9 are patentable over *Lowry*, it follows that dependent Claims 3 and 11 are patentable over *Lowry* in view of *Baraquet* when *Lowry* is relied on for the same limitations as with the rejection of the parent claims. For these reasons, Claims 3 and 11 are patentable over the cited references of record and withdrawal of the rejection of these claims is requested.

CONCLUSION

For at least the reasons set forth above, Applicants submit that all of the pending claims (1-17) present patentable subject matter over the art of record, including that which was cited but not applied, and are in condition for allowance. Therefore, Applicants respectfully request the Office to issue a timely Notice of Allowance in this case. If the Examiner has questions regarding this case, the Examiner is invited to contact Applicant's undersigned representative.

To the extent necessary, a petition for an extension of time under 37 C.F.R. §1.136 is hereby made. Please charge any shortages in fees due in connection with the filing of this paper, including extension of time fees, or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Date: 9/30/03

John D. Henkhaus
John D. Henkhaus; Reg. No. 42,656

1600 Willow Street
San Jose, CA 95125
(408) 414-1080
Facsimile: (408) 414-1076

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, Box 1450, Alexandria, VA 22313-1450

on 9/30/03 by Clare Fung